

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CHARLES BROWN, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BIOGEN IDEC INC., WILLIAM
RASTETTER AND JAMES MULLEN,

Defendants.

Civil Action No. 05-cv-10400 (RCL)

**THE LOUISIANA FUNDS' MEMORANDUM CONCERNING THEIR
MOTION FOR ENTRY OF AN ORDER CONSOLIDATING ALL RELATED
ACTIONS, APPOINTING THE LOUISIANA FUNDS' AS THE LEAD
PLAINTIFFS AND APPROVING THEIR SELECTION OF LEAD COUNSEL**

ADDITIONAL CAPTIONS ON NEXT PAGE

CARY GRILL, Individually and on behalf
of all others similarly situated,

Plaintiff,

v.

BIOGEN IDEC INC., WILLIAM
RASTETTER AND JAMES MULLEN,

Defendants.

Civil Action No. 05-cv-10453 (RCL)

ROCHELLE LOBEL, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BIOGEN IDEC INC., WILLIAM
RASTETTER AND JAMES MULLEN,

Defendants.

Civil Action No. 05-cv-10801 (RCL)

The Louisiana School Employees' Retirement System ("LSERS") and the Municipal Police Employees' Retirement System of Louisiana ("MPERS"), collectively (the "Louisiana Funds" or the "Proposed Lead Plaintiffs") respectfully submit this memorandum concerning their motion for entry of an order: (i) consolidating all related actions; (ii) appointing the Louisiana Funds as the Lead Plaintiffs in the consolidated action and any subsequently filed related cases, and (iii) approving their selection of Berman DeValerio Pease Tabacco Burt & Pucillo ("Berman DeValerio") as Lead Counsel for the Class.

The Louisiana Funds acquired Biogen Idec, Inc. ("Biogen" or the "Company") securities during the period from February 18, 2004 through and including February 25, 2005 (the "Class Period") and as a result has suffered losses of approximately \$1,047,986.13. The Louisiana Funds understand that other groups have filed motions that purportedly represent that they have greater losses. Therefore, the Louisiana Funds respectfully submit that if any of the other movant groups are found to be inadequate to represent the Class or atypical and are therefore not the "most adequate plaintiffs" to lead this litigation, that the Court appoint the Louisiana Funds as the lead plaintiffs to lead this litigation and represent the Class. The Louisiana Funds are familiar with the applicable provisions governing the appointment of the lead plaintiff in securities class actions, understand their responsibilities to the Class, and are willing and able to oversee the prosecution of this action. Further, the Louisiana Funds will ensure that the litigation is conducted in the best interests of the members of the Class and are not subject to any unique defenses that would render them incapable of adequately representing the Class.

Therefore, the Louisiana Funds respectfully request that should any of the other movant groups which claim larger losses prove to be inadequate lead plaintiffs, that the Court grant the Louisiana Funds' motion to be appointed lead plaintiff, and approve their selection of Berman DeValerio as Lead Counsel.

May 13, 2005

Respectfully Submitted,

/s/ Jeffrey C. Block

**BERMAN DEVALERIO PEASE
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